



*Consulting Engineers  
and Scientists*

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December 22, 2009  
(PBW Project No. 1352)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-RA)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Barbara Nann  
Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6RC-S)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

**RE: REVISED UPDATED SCREENING-LEVEL ECOLOGICAL RISK  
ASSESSMENT  
GULFCO MARINE MAINTENANCE SUPERFUND SITE  
FREEPORT, TEXAS**

Dear Mr. Miller and Ms. Nann:

Please find enclosed three (3) copies (Mr. Miller) and one copy (Ms. Nann) of the Revised Updated Screening-Level Ecological Risk Assessment (SLERA) for the Gulfco Marine Maintenance Superfund Site. This report incorporates comments on the Draft Updated SLERA dated May 29, 2009 as provided in your letter dated December 4, 2009. A summary of the December 4, 2009 comments and corresponding responses explaining how each comment was addressed is provided in Attachment A to this letter.

This report was prepared by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). In accordance with Paragraph 52 of the amended Unilateral Administrative Order for the Site, effective January 31, 2008 (the amended UAO), I certify that I have been fully authorized by these Respondents to submit this document and to legally bind these Respondents thereto.

Paragraph 13 of the Statement of Work attached to the amended UAO requires an electronic copy of project deliverables be provided in WordPerfect® format. However, as requested by Mr. Miller for previous project deliverables, the electronic copy of the report text is

Mr. Gary Miller and Ms. Barbara Nann

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provided in Microsoft Word® format and the other report components are provided in Adobe® format instead.

Thank you for the opportunity to submit this report. Should you have any questions, please do not hesitate to contact me at any time.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.  
Principal Engineer

Enclosure

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality (2 copies)  
Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Jessica White – National Oceanic and Atmospheric Administration  
Mr. Ron Brinkley – US Fish and Wildlife Service  
Mr. Don Pitts – Texas Parks and Wildlife Department  
Mr. Andy Tirpak – Texas Parks and Wildlife Department  
Mr. Tommy Mobley – Texas General Land Office  
Mr. John Wilder – Texas Commission on Environmental Quality  
Mr. Larry Champagne - Texas Commission on Environmental Quality